



NOV - 2 2018

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLANDAT GREENBELT  
CLERK, U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
DEPUTY

UNITED STATES OF AMERICA

v.

DARREN WESLEY TAYLOR,

Defendant

CRIMINAL NO. GLS-18-2694

\*\*\*\*\*

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Robert K. Rudolph, Special Agent with the U.S. General Services Administration (“GSA”), Office of Inspector General (“OIG”), being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I have been employed as a GSA OIG Special Agent since August 9, 2015. Presently, I am assigned to the Washington, D.C. Regional Office. My duties and responsibilities are to investigate allegations of fraud, waste, and abuse in connection with GSA programs and operations. My training and experience includes, among other things, the completion of the Criminal Investigator’s Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. I have received additional training from the Council of the Inspectors General on Integrity and Efficiency on topics such as fraud, search and seizure, preparation of criminal complaints, and arrests. I am a Certified Fraud Examiner through the Association of Certified Fraud Examiners. I hold a Bachelor’s degree in accounting from Stonehill College and a Master’s

degree in Banking and Financial Services Management from Boston University. In my capacity as a Special Agent, I have led or participated in numerous criminal investigations involving fraud.

2. I have set forth only those facts that I believe are necessary to establish probable cause in support of the criminal complaint and arrest warrant. I have not, however, excluded any information known to me that would defeat a determination of probable cause. The information contained in this affidavit is based on my personal knowledge, my review of documents and other evidence, and my conversations with other law enforcement officers and other individuals. I submit that the following facts establish probable cause to believe that between on or about May 9, 2016, and on or about October 11, 2018, **DARREN WESLEY TAYLOR (“TAYLOR”)**, a resident of Capitol Heights, Maryland committed the following federal offense on 55 occasions: Theft of Government Property, in violation of Title 18, United States Code, Section 641.

#### BACKGROUND

3. GSA Fleet is a component of the Federal Acquisition Service at GSA and provides vehicles and related management services to government agencies. Each government owned vehicle (“GOV”) is assigned a GSA Wright Express Credit Card (“Fleet CC”) for the following purposes: gasoline purchases, oil changes, miscellaneous maintenance, and car washes for the assigned vehicle. Fleet CCs are white credit cards with an American flag image horizontally across the middle third of the front of the card. The front of the card also has a GSA logo and a vertical green stripe at either end. On the left vertical stripe, the words “FOR OFFICIAL GOVERNMENT FLEET USE ONLY” are imprinted in white. The back of the Fleet CC has a horizontal black magnetic strip and a diagonal green stripe going from the upper left corner to the lower right corner. GSA pays fuel bills and maintenance costs directly to the vendor. In order to use a Fleet CC, the customer must key in a “driver ID” number that is specific to each vehicle and is on the face of the

Fleet CC. A computer program called "WEXOnline" tracks all activity on purchases and expenditures associated with each Fleet CC.

**PROBABLE CAUSE**

4. On or about March 26, 2018, GSA Loss Prevention notified GSA-OIG of potentially fraudulent transactions (fuel purchases exceeding the assigned vehicle's tank capacity) occurring on the Fleet CCs assigned to GOVs G12 0354R and G12 0355R. I conducted a search of the WEXOnline database and identified additional potentially fraudulent transactions on the Fleet CCs assigned to GOVs G10 5481M, G13 1818V, G32 0273H, G41 2759R, G41 2824R, G41 4865P, G43 2362H, G43 3116N, G43 3311K, G62 3660S, G63 0631R, G63 0649P, G63 2310P, G63 3149H, and G63 3415U. These vehicles are leased by GSA to the U.S. Navy at the Naval Surface Warfare Center, Carderock Division, ("NSWCC") in Bethesda, Maryland.

5. On or about April 17, 2018, I obtained video surveillance footage from the Wawa gasoline station located at 305 Market Square Drive, Prince Frederick, Maryland. The footage was of a transaction that occurred on or about March 9, 2018, using the Fleet CC assigned to GOV G12 0354R, which vehicle is a black 2016 Ford Fusion Hybrid. At the time of the transaction, a dark colored Cadillac sport utility vehicle was present at gasoline pump number six. I obtained a copy of the transaction journal for this transaction, showing a Fleet CC was used to purchase gasoline at pump number six. On or about April 25, 2018, I obtained additional video footage of March 9, 2018, in which I observed the driver, a black male with a beard and tattoos, enter the Wawa station store and purchase merchandise with what appeared to be a personal credit card.

6. On or about April 18, 2018, I obtained video surveillance footage from the Exxon gasoline station located at 5520 Marlboro Pike, District Heights, Maryland. The footage was of a transaction that occurred on or about April 16, 2018, using the Fleet CC assigned to GOV G43

3116N, which vehicle is a white 2013 Ford E350. The video surveillance system was approximately twelve hours behind the current time. I observed a dark colored Cadillac sport utility vehicle present at the gasoline pump.

7. On or about July 3, 2018, I obtained video surveillance footage from the 7-Eleven gasoline station located at 3730 Branch Avenue, Temple Hills, Maryland. The footage was of a transaction that occurred on or about June 22, 2018, using the Fleet CC assigned to GOV G10 5481M, which vehicle a white 2012 Hyundai Sonata Hybrid. At the time of the transaction, a dark colored Cadillac sport utility vehicle was present at gasoline pump number five. I obtained a copy of the electronic journal report for this transaction, showing a Fleet CC was used to purchase gasoline at pump number five.

8. On or about July 6, 2018, I obtained video surveillance footage from the BP gasoline station located at 4909 Marlboro Pike, Capitol Heights, Maryland. The footage was of a transaction that occurred on or about July 4, 2018, using the Fleet CC assigned to GOV G63 3415U, which vehicle is a white 2011 Ford F350. At the time of the transaction, a dark colored Cadillac sport utility vehicle was present at gasoline pump number four. I obtained a copy of the receipt for this transaction, showing a Fleet CC was used to purchase gasoline at pump number four.

9. On or about July 30, 2018, I obtained video surveillance footage from the Exxon Mobil gasoline station located at 2305 Pennsylvania Avenue, Southeast, Washington, DC.<sup>1</sup> The footage was of a transaction that occurred on or about July 21, 2018, using the Fleet CC assigned to GOV G12 0354R, which vehicle is a black 2016 Ford Fusion Hybrid. At the time of the transaction, a dark colored Cadillac sport utility vehicle bearing Maryland license plate 01481CE

---

<sup>1</sup> The complaint does not charge purchases made in Washington, D.C.

was present at gasoline pump number one.<sup>2</sup> I obtained a copy of the receipt for this transaction, showing a Fleet CC was used to purchase gasoline at pump number one.

10. A vehicle query of the National Law Enforcement Telecommunications System revealed the registration for Maryland license plate 01481CE is associated with a 2005 Cadillac Escalade which is registered to **TAYLOR**.

11. On or about August 1, 2018, I obtained video surveillance footage from the BP gasoline station located at 4909 Marlboro Pike, Capitol Heights, Maryland. The footage was of a transaction that occurred on or about July 26, 2018, using the Fleet CC assigned to GOV G63 0649P, which vehicle is a silver 2015 Ford F250. Immediately after the time of the transaction, a dark colored Cadillac sport utility vehicle exited the gasoline station. I obtained a copy of the receipt for this transaction, showing a Fleet CC was used to purchase gasoline at pump number two.

12. On or about August 1, 2018, I observed a dark blue Cadillac Escalade bearing Maryland license plate 01481CE parked at **TAYLOR**'s residence on Arcadia Avenue in Capitol Heights, Maryland.

13. On or about August 13, 2018, another GSA-OIG Special Agent obtained video surveillance footage from the Shell gasoline station located at 10211 Westlake Drive, Bethesda, Maryland. The footage was of a transaction that occurred at the Exxon Mobil gasoline station, next to the Shell gasoline station, located at 10201 Westlake Drive, Bethesda, Maryland, on or about August 8, 2018, using the Fleet CC assigned to GOV G13 1818V, which vehicle is a white

---

<sup>2</sup> I determined the complete license plate number by providing partial license plate number "01481" to the Maryland Coordination and Analysis Center ("MCAC"). From the surveillance video, I saw that there were two stacked letters following the five visible numbers. A senior investigator with MCAC searched the Maryland Motor Vehicle Administration database for all Cadillac Escalades with a Chesapeake Bay commemorative license plate beginning with 01481 and ending with two stacked letters. This search resulted in one license plate number, that is, 01481CE.

2018 Chevrolet Bolt. Immediately prior to the time of the transaction, a dark colored Cadillac sport utility vehicle was observed entering the parking lot and driving in the direction of the Exxon Mobil gasoline station.

14. On or about August 17, 2018, I obtained video surveillance footage from the BP gasoline station located at 4101 Alabama Avenue, Southeast, Washington, DC. The footage was of a transaction that occurred on or about August 14, 2018, using the Fleet CC assigned to GOV G13 1818V, which vehicle is a white 2018 Chevrolet Bolt. At the time of the transaction, a dark colored Cadillac sport utility vehicle was present at gasoline pump number four. I obtained a copy of the receipt for this transaction, showing a Fleet CC was used to purchase gasoline at pump number four.

15. On or about October 16, 2018, I obtained video surveillance footage from the Shell gasoline station located at 5010 Benning Road, Southeast, Washington, D.C. The footage was of a transaction that occurred on or about October 11, 2018, using the Fleet CC assigned to GOV G41 4865P, which vehicle is a gray 2015 Dodge Grand Caravan. At the time of the transaction, a dark colored Cadillac sport utility vehicle was present at a gasoline pump.

16. From between on or about May 9, 2016, to on or about May 21, 2018, on approximately 49 different days, Fleet CCs were used to purchase gasoline at the BP gasoline station located at 4909 Marlboro Pike, Capitol Heights, Maryland. (See Exhibit 1.) Google Maps shows that **TAYLOR**'s residence is located 1.3 miles from this gasoline station and NSWCC is located 21.2 miles from this gasoline station. I observed a vehicle matching the description of **TAYLOR**'s Cadillac Escalade in surveillance video at the same BP gasoline station on or about July 4, 2018, and on or about July 26, 2018, when Fleet CCs were used.

17. **TAYLOR**, Crane Team Lead, has been employed by the U.S. Navy at the NSWCC in Bethesda, Maryland, since approximately 2012.

18. On or about October 19, 2018, another GSA-OIG Special Agent and I interviewed Individual 1, an employee at NSWCC. Individual 1 is knowledgeable about the management of GOVs assigned to NSWCC. Individual 1 stated that each NSWCC employee is informed how to use a GOV and a Fleet CC. Individual 1 did not believe any NSWCC employees would be performing work or fueling GOVs in Capitol Heights, Maryland. Individual 1 stated that **TAYLOR** had access to the GOVs and was the only NSWCC employee in the office in which **TAYLOR** worked who lives in Capitol Heights, Maryland.

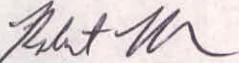
19. On or about October 19, 2018, another Special Agent and I interviewed **TAYLOR** at his residence in Capitol Heights, Maryland. **TAYLOR** was given a *Garrity* warning and voluntarily provided oral statements. During the interview, **TAYLOR** demonstrated an understanding of how to properly use Fleet CCs.

20. When asked if Fleet CCs can be used to fuel personally owned vehicles, **TAYLOR** stated, "no." When asked if he has ever used a Fleet CC to fill up his personally owned vehicle, **TAYLOR** stated, "no." After being shown a still photograph of video surveillance footage relating to the use of a Fleet CC on or about July 21, 2018 at the Exxon Mobil gasoline station located at 2305 Pennsylvania Avenue, Southeast, Washington, D.C., **TAYLOR** admitted that he has used Fleet CCs to fuel his personally owned vehicle. He did not specify dates and locations. He claimed that he had engaged in this conduct as a subsidy during a period of financial difficulty. I terminated the interview as soon as **TAYLOR** expressed an interest in talking to an attorney.

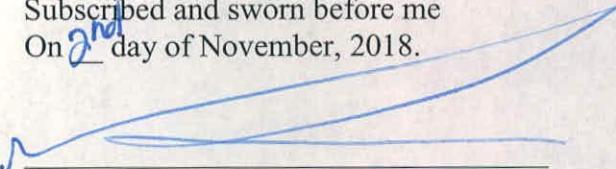
21. Given the facts above, I believe that the total loss attributable to **TAYLOR** for the fraudulent use of Fleet CCs from between on or about May 9, 2016, and on or about October 11, 2018, is approximately \$2,725.04.

**CONCLUSION**

22. Based on the above facts outlined in the affidavit, I respectfully submit that there is probable cause to believe that **TAYLOR** committed the following federal offense on 55 occasions between on or about May 9, 2016 and on or about October 11, 2018: Theft of Government Property, in violation of Title 18, United States Code, Section 641.

  
\_\_\_\_\_  
Robert K. Rudolph  
Special Agent  
U.S. General Services Administration  
Office of Inspector General

Subscribed and sworn before me  
On 2<sup>nd</sup> day of November, 2018.

  
\_\_\_\_\_  
The Honorable Gina L. Simms  
United States Magistrate Judge